



March 5, 2003

Ms. Verneta Simon
Mr. Fred Micke
U. S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd., SE-5J
Chicago, Illinois 60604

EPA Region 5 Records Ctr.



232865

RE: Response to USEPA Review Comments, 341 East Ohio Street Completion Report - STS Project
No. 1-25585-XJ

Dear Ms. Simon and Mr. Micke:

On behalf of Teachers Retirement System of Illinois (TRS), STS Consultants, Ltd. (STS) has completed our revisions to the above referenced report in response to your review comments. Attached please find three copies of the revised report. We have summarized our revisions to your review comments below.

Comment 1. We have made the requested change from 1916 to 1915.

Comment 2. We have made the following insert to the last paragraph:

The Work Plan did not specifically address radiologically-impacted materials located outside of the boundaries of the subject site under the immediately adjacent City of Chicago's sidewalk right-of-way and, as a result, radiologically-impacted materials remain under the adjacent sidewalks.

Comment 3. We have made the following insert at the end of the last paragraph:

Again, as referenced previously, while TRS has fully satisfied its obligations under the Work Plan and no radiological or pesticide impacted material remains within the boundaries of the Subject Site, there are, however, remaining radiologically-impacted materials beneath the immediately adjacent sidewalks and there are restrictions on the access to those materials during the installation and maintenance of utilities and other activities which may expose the impacted subsurface soils.

Comment 4. Reference has been added to the location of these data in Appendix O, and that the data will be included when received.

Comment 5. The text has been changed to note that the samples may be divided into either 5 or 6 sub-samples.

Comment 6. An insert describing the incident with untarped trucks has been added as Section 2.9.6.

Comment 7. An insert describing the helicopter incident has been added as Section 2.9.7.

Comment 8. The date has been changed from 1916 to 1915.

Comment 9. The quantity of radiologically-impacted soil has been added, along with the number of placarded containers. Note that an error in the number of containers has been corrected, from 275 to 285.

Comment 10. The following paragraph has been added:

4.3 Radiologically Impacted Materials Beneath the Adjacent Sidewalks

In the course of removal of radiologically-impacted soil, several locations were found that exhibit impacts beneath the City of Chicago sidewalks adjacent to but outside the boundaries of the Subject Site. Those locations and the level of radiological activity found are shown on Figure 9. TRS did not remove this impacted material as it was not within the legal boundaries of the Subject Site.

Comment 11. The following sentence has been added at the end of the paragraph

As previously indicated, the Work Plan did not specifically address radiologically-impacted materials located under the City of Chicago's sidewalk right-of-ways immediately adjacent to but outside the boundaries of the Subject Site, and as a result, radiologically-impacted materials remain under the adjacent sidewalks.

Comment 12. Reference to the resources utilized to complete the removal action has been added as Section 1.7.

Comment 13. Figure 6A has been added to illustrate the portions of the pesticide impacted area that was also radiologically impacted.

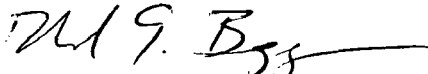
Comment 14. Figure 9 presents the requested information.

We anticipate with the incorporation of these changes the report will be able to be issued final. Upon notice that these changes are accepted, we will issue a revised cover page, a signed affidavit and sufficient copies of the portions of the report that were changed to incorporate these changes. It is not our intention to reissue those portions of the report that were not changed in response to these review comments.

Please contact us with any questions you may have regarding these revisions to the Completion Report and any other aspects of this project.

Regards,

STS CONSULTANTS, LTD.



Richard G. Berggreen, C.P.G.
Principal Geologist

cc: John Watson, Gardner, Carton and Douglas
Tom Pabian, Capri Capital
Terry McKay, Capri Capital
Mark Krippel, Kerr-McGee Chemical LLC